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ZACHARY W. CARTER Corporation Counsel

## THE CITY OF NEW YORK LAW DEPARTMENT

100 CHURCH STREET NEW YORK, NY 10007-2601 Iván A. Méndez, Jr.
Assistant Corporation Counsel
Phone (212) 356-2450
Fax (212) 356-8760
Email imendez@law nyc gov

March 15, 2019

## By ECF

Honorable John G. Koeltl United States District Court Southern District of New York 500 Pearl Street, Courtroom 12B New York, NY 10007-1312 APPLICATION GRANTED
SO ORDERED

John G. Koeltl, U.S.D.J.

Re: <u>Luc R. Pierre v. The City of New York et al.</u>, 17 Civ. 5782 (JGK)

Dear Judge Koeltl:

I am an Assistant Corporation Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, attorney for defendants in the above-referenced action. I write, with the consent of plaintiff's counsel, to respectfully request that the defendants' deadline for making their motion for summary judgment be adjourned by two weeks, from March 21, to April 4, 2019, and that plaintiff's deadline for filing his response, and the defendants' deadline to file their reply, be similarly extended by two weeks, from April 29 to May 13, and from May 10 to May 24, 2019, respectively. This is the defendants' first such request, and the requested extension of time will not affect any other scheduled deadlines.

As the Court may recall, on the date of the pre-motion conference defendants received four out of the seven transcripts of the depositions of the defendants and one non-party. The final three outstanding transcripts were received on February 11<sup>th</sup>, and provided to the parties for correction shortly thereafter. The transcript errata for most of the transcripts were returned to me earlier this week. In addition, last Thursday I was required to file a motion for summary judgment in Enyia v. Health & Hospitals, 16 Civ. 6344, currently pending before the Honorable Ronnie Abrams, and by March 29, I must move for summary judgment in a 2013 State Court action, Lin v. DOE, Index No. I01166/13. This, together with extremely burdensome discovery in Coleman v. City of NY, 17 Civ. 7265 (S.D.N.Y.), where discovery is set to close in one month, necessitate that I request two additional weeks to draft the defendants' motion papers. As noted above, plaintiff consents to the requested modification of the briefing schedule.

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Defendants thank the Court for its consideration of this request.

Respectfully submitted,

Assistant Corporation Counsel

LAW OFFICES OF K.C. OKOLI, P.C. Att: Kenechukwu Chudi Okoli cc:

(By ECF)